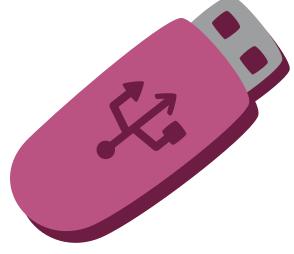


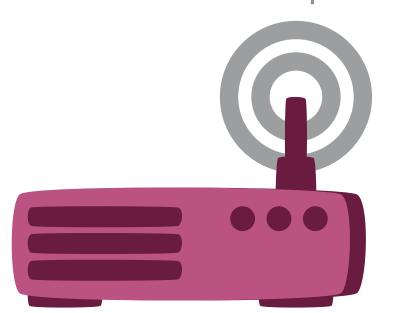


Protocol for the Enforcement of the Right to Digital Disconnection at IRBLleida



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## 1. Statement of Principles



In the current context of digital transformation, the intensive use of Information and Communication Technologies (ICT) has progressively blurred the boundaries between work and personal life. This situation can have negative effects on the staff's mental and physical health if clear limits are not established. Aware of this reality, IRBLleida recognizes the importance of ensuring real spaces for rest, leisure, and work-life balance, as well as avoiding the constant use of digital tools outside working hours. For this reason, the institution commits to promoting a healthy work environment in which the right to digital disconnection is respected.

### 2. Purpose

## 3. Scope of Application

This protocol aims to regulate the exercise of the right to digital disconnection for all IRBLleida staff. It also establishes the procedure to be followed when there are indications that this right is not being respected, with the goal of ensuring a rapid, impartial, and effective response to potential violations.

This protocol applies to all IRBLleida staff, regardless of professional category, type of contract, type of working hours, or hierarchical level. For the protocol to be applicable, there must be an active employment relationship with the institution at the time the potential violation of the right to digital disconnection is detected.

### 4. Digital Measures

### Disconnection



To protect the right to disconnection, the following measures are adopted:

Attendance at meetings and online training: All calls must respect each employee's working hours. It is recommended to use official corporate channels for internal communication, such as Teams chat, and to avoid the use of personal channels (WhatsApp, Telegram, etc.) for work-related matters, especially outside established working hours. Likewise, sending emails outside working hours should be avoided. When it is essential to draft emails outside

this time, it is recommended to use the scheduling option so that they are delivered during the recipients' working day.

**Information and awareness:** All staff must be properly informed about this policy. The information must be provided at the time of its implementation, whenever modifications occur, and also during the onboarding process for new hires. In addition, the policy must be accessible on the intranet and on IRBLleida's Transparency Portal.

**Justified exceptions:** Although the right to disconnection must be respected, there are extraordinary situations that may require an immediate response, such as:

- Risks to the integrity of people, facilities, or equipment.
- Danger to service continuity or serious harm to the center's activity or its entities.
- Urgent needs of users or clients.

Situations that could negatively affect the institutional image.

### 5. Intervention Process

In the event of non-compliance with the digital disconnection measures, the protocol establishes an intervention process in four phases:

#### 1. Communication and guidance

The affected person may request intervention by writing to the People Department (rrhh@irblleida.cat).

They will be offered an initial counseling session within a maximum period of 3 working days.

This phase aims to provide support and guidance to enable informed and autonomous decisions, ensuring confidentiality at all times.

#### 2. Investigation

If, after counseling, the person decides to proceed, their request will become a formal complaint. A working group will be formed, composed of representatives from the People Department, the Health and Safety Committee, and the Works Council. Other experts may be included if required.

The complaint must be supported by solid evidence (e.g., emails, screenshots, witnesses, timeline). The reported person will be informed as soon as possible and given the opportunity to present their version and evidence. During the investigation, managers of the affected group or department may be consulted to verify the information.

#### 3. Report

The investigation will conclude with a report (within a maximum of 30 working days) that will include:

- Identification of the persons involved.
- Description of the context, individuals who participated in the investigation, evidence, and actions taken.
- Assessment of the facts and proposals for corrective or disciplinary measures, if the violation is confirmed.
- If the violation is not confirmed, the complaint will be closed.
- If it is determined that the complaint was filed in bad faith, or that the evidence or testimonies provided are false, the complainant and any witnesses involved may be sanctioned.

Communication and follow-up

The report will be communicated to the parties involved.

If measures are determined, the working group will inform the relevant parties for their implementation.

A biannual follow-up will be carried out to assess whether the measures have been effective.

#### Respect and Protection

- The persons involved may be accompanied by someone they trust from the workplace.
- Those with hierarchical superiority or who are involved as witnesses may not act as companions.
- Summoned persons must cooperate, unless there is a justified conflict of interest.
- It is guaranteed that there will be no retaliation for participating in the process.

#### Fair tratment

- Fair and impartial treatment is ensured, and all parties are expected to act in good faith to clarify the facts.
- If signs of a violation of the right to digital disconnection are detected, precautionary measures such as reassignments or leave may be proposed.
- These measures will not negatively affect the working conditions of either the complainant or the reported person and will require their acceptance.

### 6. Guarantees of Action

The protocol establishes a set of guarantees to ensure that interventions are carried out with fairness, confidentiality, and respect.

#### Confidenciality

All information related to the procedure will be confidential, and the persons involved must sign a confidentiality agreement and refrain from disclosing any data. To preserve anonymity, identification codes will be assigned to the participants.

#### Right to information

The persons involved have the right to be informed about the procedure, its stages, and their rights and duties at all times.

#### Diligence and promptness

- The procedure will specify the resolution deadlines for the different stages to ensure a swift and effective handling of requests.
- False complaints submitted in bad faith will be considered a disciplinary offense.
- The presumption of innocence of the reported person is guaranteed until proven otherwise.

## 7. Quality Management System





	Document name	FP	Code	Date	Rev.
IRB Jeida R Institut de Recerca Biomèdica	Digital disconection protocol	FP005	PNT011	09/05/2025	1
	Aproved: People and legal				

VERSION HISTOR	VERSION HISTORY				
Revision number	Effective date	Author/a	Reason for revision change		
1	09/05/2025	EMM	Initial version		